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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JONNAH GARCIA, an individual;

Plaintiff,

v.

NAVIENT SOLUTIONS, LLC, a foreign limited-
liability company; NATIONAL RECOVERIES,
INC., a foreign corporation; EQUIFAX
INFORMATION SERVICES, LLC, a foreign
limited-liability company; EXPERIAN
INFORMATION SOLUTIONS, INC., a foreign
corporation; TRANS UNION LLC, a foreign
limited-liability company;

Defendants.

Case No.: 2:18-cv-2311-RFB-VCF

**STIPULATION AND ORDER
EXTENDING TIME TO FILE
OPPOSITION TO NATIONAL
RECOVERIES, INC.'S MOTION FOR
SUMMARY JUDGMENT [Dkt. 32]
(First Request)**

IT IS HEREBY STIPULATED AND AGREED between Plaintiff, Jonnah Garcia
("Garcia), and Defendant, National Recoveries, Inc. ("NRI") (collectively referred to as the
"Parties"), by and through their respective attorneys of record, and subject to the approval of the
Court, that Plaintiff's deadline to file her Opposition to NRI's Motion for Summary Judgment
[Dkt. 32], filed on July 26, 2019, is hereby extended up to and including **August 26, 2019**;

Plaintiff received the transcripts from the July 31, 2019 depositions today and requires a
brief extension to review these materials to adequately respond to the pending Motion for
Summary Judgment;

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1 The Parties have also been in settlement discussions regarding this matter and the
2 additional time will permit these discussions to continue without expending unnecessary fees and
3 costs.

4 This is the Parties first request for an extension of this deadline and is not made for the
5 purpose of delay or bad faith.

6 Respectfully Submitted.

7 Dated: August 15, 2019

8 **LAW OFFICE OF**
9 **KEVIN L. HERNANDEZ**


10 /s/ Kevin L. Hernandez
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16 *Attorney for Plaintiff*

Dated: August 15, 2019

ALVERSON TAYLOR & SANDERS

/s/ Trevor Waite
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IT IS SO ORDERED:

17 
18 _____
19 RICHARD F. BOULWARE, II
20 UNITED STATES DISTRICT JUDGE

DATED this 16th day of August, 2019.